

Pennsylvania Department of Environmental Protection

2 East Main Street Norristown, PA 19401

December 18, 2008

Phone: 484-250-5970 Fax: 484-250-5971

Mr. Jose Ramos/Partner

Southeast Regional Office

White Pine Partners, LP One Red Lion Road Philadelphia, PA 19115

Re:

Island Green Country Club

IW PA0056502 File Type: NPDES

City of Philadelphia/Lower Moreland Township

Philadelphia/Montgomery Counties

Dear Mr. Romas:

Your permit is enclosed.

On September 2, 2008, Mr. Thomas G. Pullar of Earth Res Group submitted comments on the draft NPDES permit dated August 25, 2008. We have completed our review of those comments and offer the following response and changes to the permit:

- The permit requires that the facility shall collect and analyze at least one sample for PCBs 1. utilizing method 1668A from Outfall 002 during wet weather event within 12 months from permit issuance. If sample results show that the PCBs are not detectable and no PCB sources exist, the Department will reevaluate the further PCB sampling and analysis requirements.
- The facility contains some wooded areas and wildlife exists in the wooded area. The 2. stormwater runoff from the wooded area have potential of fecal coliform contamination due to wildlife. However, based on the information provided, and the request we received from your consultant, we are removing the requirement to collect fecal coliform samples from the Outfall 002. The Department will conduct a site evaluation in the near future to determine the need for such a requirement. We also suggest you conduct such survey for locating any source of fecal coliform.

Your Discharge Monitoring Reports (DMR) and Supplemental Reporting Forms are included. These should be completed as instructed in the permit and Instruction Sheet.

We would like to bring your attention to the Department's new electronic DMR (eDMR) program. The program can be accessed through the Internet at www.dep.state.pa.us/edmr and can be used in lieu of paper DMR submissions. Please find enclosed additional information concerning eDMR. We highly encourage your participation in this program.

Any person aggrieved by this action may appeal, pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. Section 7514, and the Administrative Agency Law, 2 Pa.C.S. Chapter 5A, to the Environmental Hearing Board, Second Floor, Rachel Carson State Office Building, 400 Market Street, P.O. Box 8457, Harrisburg, PA 17105-8457, 717-787-3483. TDD users may contact the Board through the Pennsylvania Relay Service, 800-654-5984. Appeals must be filed with the Environmental Hearing Board within 30 days of receipt of written notice of this action unless the appropriate statute provides a different time period. Copies of the appeal form and the Board's rules of practice and procedure may be obtained from the Board. The appeal form and the Board at 717-787-3483. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST REACH THE BOARD WITHIN 30 DAYS. YOU DO NOT NEED A LAWYER TO FILE AN APPEAL WITH THE BOARD.

IMPORTANT LEGAL RIGHTS ARE AT STAKE, HOWEVER, SO YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD (717-787-3483) FOR MORE INFORMATION.

If you have any questions, please call Mr. Parvin Patel at 484-250-5194.

Sincerely,

Jenifer Nields, P.E. Regional Manager Water Management

Enclosures

cc: Mr. Pullar – Earth Res Group, Inc.
Lower Moreland Township
EPA 3WP11 (Transmittal Letter Only)
Montgomery County Health Department
Philadelphia Health Department
Operations Section
Data Systems and Analysis
File
Re (GJE08)193-18